

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BUSPATROL AMERICA, LLC)	
)	
Plaintiff,)	
)	Civil No. 3:18-cv-00991-D
v.)	
)	Jury Trial Demanded
AMERICAN TRAFFIC SOLUTIONS, INC.)	
)	
Defendant.)	
)	

**DEFENDANT’S MOTION TO DISMISS
BUSPATROL’S ORIGINAL VERIFIED PETITION AND,
IN THE ALTERNATIVE, MOTION FOR A MORE DEFINITE STATEMENT**

Pursuant to Rules 8(a)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendant American Traffic Solutions, Inc. (“ATS”) respectfully moves to dismiss Plaintiff BusPatrol America, LLC’s (“BusPatrol”) Original Verified Petition and Application for Temporary Restraining Order and Injunctive Relief, filed in the District Court of Dallas County, Texas, 95th Judicial District on April 13, 2018 prior to removal of this cause of action. Alternatively, pursuant to Rules 12(e) and 16(c)(2)(L), ATS respectfully moves the Court to order Plaintiff to identify any allegedly misappropriated trade secret(s) with particularity.

In support of its Motion, ATS relies upon the Memorandum in Support of its Motion to Dismiss BusPatrol’s Original Verified Petition and, in the Alternative, Motion for a More Definite Statement, filed herewith.

WHEREFORE, Defendant ATS requests that the Court grant its Motion to Dismiss BusPatrol’s Original Verified Petition and, in the Alternative, Motion for a More Definite Statement. Defendant ATS further requests any other relief, whether in law or in equity, to which this Court may find ATS to be justly entitled.

Dated: May 7, 2018

Respectfully submitted,

/s/ Phillip B. Philbin

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2018, I electronically submitted the foregoing document with the clerk of court for the United States District Court for the Northern District of Texas, using the electronic case files system of the Court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Phillip B. Philbin

Phillip B. Philbin